

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

**Robertson, Anschutz, Schneid, Crane & Partners,
PLLC**

Authorized Agent for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886

Sherri R. Dicks, Esq. (004282003)

In re:

Henry Bell, Jr.,

Debtor.

Case No.: 22-15432

Chapter: 13

Hearing Date: December 4, 2024

Judge: Rosemary Gambardella

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:
December 4, 2024 at 10:00 A.M.

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

Debtor(s)- Henry Bell, Jr. 299 Ege Avenue Jersey City, NJ 07304	Debtor/Debtor Attorney- Moshie Solomon Law Offices of Moshie Solomon, P.C. 2 University Plaza Suite 100 Hackensack, NJ 07601	Trustee- Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004- 1550	U.S. Trustee- US Dept of Justice Office of the US Trustee One Newark Center Ste. 2100 Newark, NJ 07102
--	--	---	--

PLEASE TAKE NOTICE that on December 4, 2024, at 10:00 A.M. or as soon thereafter as counsel may be heard, Robertson, Anschutz, Schneid, Crane & Partners, PLLC, attorneys for SHOREBREAK NPL TRUST, the within creditor ("Creditor"), shall move before the Honorable Rosemary Gambardella United States Bankruptcy Judge, at US Bankruptcy Court, District of New Jersey, Courtroom 3E, 50 Walnut Street, 3rd floor, Newark, New Jersey 07102, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, 50 Walnut street, 3rd Floor, Newark, New Jersey 07102**, and simultaneously served on Secured Creditor's counsel, 130 Clinton Road-Lobby B, Suite 202 Fairfield, NJ 07004, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: November 15, 2024

**Robertson, Anschutz, Schneid, Crane &
Partners, PLLC**

Attorneys for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004

Telephone: 973-575-0707

Facsimile: 973-404-8886

By: /s/ Sherri R. Dicks

SHERRI R. DICKS, ESQ.